

J. Pace Law, PLLC

30 Wall Street, 8th Floor
New York, NY 10005
jpace@jpacelaw.com
(917) 336-3948

Via ECF

April 25, 2025

Hon. Jeannette Vargas
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Haggai et al., v. Kiswani et al., 25-civ-2400(JV)

Dear Judge Vargas,

I represent Defendants Cameron Jones and Maryam Alwan in the above-captioned matter. I write on behalf of Mr. Jones and Ms. Alwan, and at the request of Defendant Mahmoud Khalil, to respectfully request an extension of time for these Defendants to respond to the Complaint. The aforementioned Defendants and Plaintiffs jointly propose the following schedule:

Motions to dismiss: due by May 30, 2025.
Oppositions: due 45 days thereafter.
Replies: due 14 days after oppositions.

According to the docket, current deadlines for responsive pleadings are April 16 (Ms. Alwan),¹ April 22 (Mr. Khalil), and April 29 (Mr. Jones). *See* ECF Nos. 11-13. This is Defendants' first request for an extension. No appearance is currently scheduled in this matter.

Thank you for your attention to this matter.

Respectfully submitted,

/S/ Joseph Pace
J. PACE LAW, PLLC
30 Wall Street, 8th Floor
New York, NY 10005
Tel: (917) 336-3948
jpace@jpacelaw.com

Cc. Mahmoud Khalil (via counsel)

¹ Although an April 11, 2025 docket entry reflects that a summons was executed as to Ms. Alwan on March 26, 2025, Ms. Alwan contests that service was properly effected.